

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

GINNY YOUNG-HASHA)
Plaintiff)
)
VS.) Case No. 6:23-cv-3346
)
INFUSED INDUSTRIES, LLC)
d/b/a BISON INFUSED)
Defendant)

COMPLAINT

PLAINTIFF, by counsel, sets forth his Complaint against Defendant as follows:

1. This action is brought pursuant to the Americans with Disabilities Act.
2. The events giving rise to this action occurred in the Western District of Missouri.
3. Defendant manufactures and sells infused marijuana products, including chocolates, gummies, and drinks.
4. Plaintiff has disabilities, including Adult Attention Deficit Disorder, Attention Deficit Hyperactive Disorder and Autism.
5. Plaintiff was employed by Defendant at its location in Buffalo, Missouri between January and March 2023 as a Manufacturing Technician.
6. Defendant was aware of Plaintiff's disabilities at the time of her hire.
7. Plaintiff would have been able to perform the essential functions of her job with reasonable accommodation.
8. Upon Plaintiff's hire, Plaintiff requested Defendant make accommodations for Plaintiff's disabilities.
9. Said accommodation would have included a day off up to three times per month.
10. Defendant would have been able to accommodate Plaintiff's disabilities.
11. Defendant refused to provide Plaintiff with an accommodation for her disabilities.
12. On or about March 24, 2023 Defendant terminated Plaintiff's employment.

13. Defendant terminated Plaintiff's employment for one or more of the following reasons:

- a. Because of Plaintiff's disabilities.
- b. In retaliation for requesting reasonable accommodation.

14. As a result of Defendant's actions Plaintiff has been damaged.

15. Plaintiff filed a charge of discrimination with the EEOC on or about September 9, 2023. A true and accurate copy is attached hereto as Exhibit 1 and incorporated herein by reference.

16. The EEOC issued Plaintiff a Notice of Right to Sue on September 11, 2023. A true and accurate copy is attached hereto as Exhibit 2.

17. Plaintiff demands a trial by jury on all matters so triable.

WHEREFORE Plaintiff prays the Court for judgment against Defendant for Plaintiff's damages, costs, attorney fees, punitive damages, and such other relief as is just and lawful.

LAMPERT LAW OFFICE, LLC

By:/s/ Raymond Lampert

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